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DEPUTY

Case No.: S0200CV201900161
HON. LAURA CARDINAL

970 SOUTH MAIN STREET
SNOWFLAKE, ARIZONA 85937
(928) 536-3001
JOSEPH E. HOLLAND, 024706
joseph@hollandsaline.com
JON H. SALINE, 028445
jon@hollandsaline.com
HUNTER T. LEWIS, 030049
hunter@hollandsaline.com
Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF Cochise

DPJRE LLC,

Plaintiff,

v.

Julia C Dahlstrand aka Julia C Cota-Almedia,
Cochise County Treasurer, and ALL
UNKNOWN HEIRS and ASSIGNS,

Defendants.

Cause No. _____

COMPLAINT

**FORECLOSURE OF
RIGHT TO REDEEM**

(Sounding in Quiet Title)

COMES NOW, Plaintiff DPJRE LLC, by and through counsel undersigned, and hereby
alleges as follows:

1. The above-mentioned Defendants are proper parties to this action in that they claim
or may claim some interest in the real property that is the subject of this action.

2. This action is brought for the purpose of foreclosing the Right of Redemption in
accordance with A.R.S. § 42-18201 *et al.* on real properties located in Cochise County, Arizona
(hereinafter, the "Property"), hereinafter described as follows and bearing the respective tax parcel
numbers:

Lots 27, 28, 29, 30, 31, and 32, of Block 9 situated in the City of Douglas,
Cochise County, Arizona, and bounded and described upon a map entitled

1 **"map of Douglas Townsite, made by E.G. Howe, C.E. dated January 12,**
2 **1901, as amended," and filed into the Cochise County Recorder's office**

3 **Also known as: Cochise County Parcel Number: 409-09-006**

4 3. Defendants, separately or jointly, failed to maintain the real property taxes on the
5 Property.

6 4. Plaintiff has purchased Certificate of Purchase #0149716 for 2014, 2016, and 2017
7 tax years.

8 5. In accordance with A.R.S. § 42-18201 *et al.*, Plaintiff is entitled to foreclose the right
9 of redemption to these properties and seeks foreclosure from this Court.

10 6. Defendants have failed to redeem the Property taxes in accordance with A.R.S. § 42-
11 18201 *et al.*

12 7. Plaintiff's right to the Property is superior to Defendants' or any and all other
13 persons' interests, subject to the defendants' right of redemption.

14 8. A.R.S. § 42-18201 *et al.* requires Defendants to either:

15 a. redeem the Property tax liens prior to entry of judgment of foreclosure; or

16 b. forfeit title to the Property.

17 9. In the event of redemption during pendency of this action, A.R.S. § 42-18206 entitles
18 Plaintiff to judgment against Defendants for all costs and attorney's fees, in addition to the amount
19 of all tax liens held by Plaintiff plus interest at the rate stated in the certificate of purchase and
20 statutory fees paid by Plaintiff in connection with the certificates, as described in A.R.S. § 42-
21 18153.

22 10. Plaintiff has incurred attorney's fees and costs in bringing this action at a flat fee (per
23 parcel foreclosed).

24 WHEREFORE, Plaintiff prays for judgment as follows:
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1 A. Against Defendants and each of them for:

2 i. Foreclosure of right to redeem the Property; and

3 ii. Order granting such other and further relief as is just and proper.

4 B. In the alternative, should Defendants exercise their right of redemption during the
5 pendency of this action in accordance with A.R.S. § 42-18206, for:

6 i. All reasonable costs incurred in noticing Plaintiff's intent to foreclose and bringing
7 this action;

8 ii. Attorneys' fees in the amount of \$2,000.00 per parcel; and

9 iii. Order granting such other and further relief as is just and proper.
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11 DATED this 23 April 2019.

12 HOLLAND SALINE & LEWIS

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14 By /s/ Joseph E. Holland
15 Joseph E. Holland, Esq.
16 *Attorney for Plaintiff*
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